

**THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

KIMBERLY DIEI,

*Plaintiff,*

v.

RANDY BOYD, ET AL.,

*Defendants.*

**CIVIL ACTION NO.  
2:21-cv-02071-JTF-cgc**

**JURY TRIAL DEMANDED**

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**JOINT MOTION FOR LEAVE TO FILE A SINGLE BRIEF IN RESPONSE TO  
DEFENDANTS' MOTIONS TO DISMISS AND TO EXCEED PAGE LIMITATION**

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Plaintiff Kimberly Diei And Defendants Randy Boyd, et al. hereby submit this *Joint Motion for Leave to File a Single Brief in Response to Defendants' Motions to Dismiss and to Exceed Page Limitation* by and through the undersigned attorneys.

Plaintiff respectfully moves the Court for leave to file a single, overlength brief in response to Individual Capacity Defendants' Motion to Dismiss the Fourth and Fifth Causes of Action [Doc. 24] and Official Capacity Defendants' Motion to Dismiss the First, Second, and Third Causes of Action [Doc. 25] ("Defendants' Motions to Dismiss"). Local Rule 12.1(b) limits the length of memoranda in opposition to motions to twenty (20) pages. Plaintiff respectfully moves this Court for leave to file a single response exceeding the page limitation, not to exceed fifty (50) pages.

Defendants respectfully move this Court for leave to file reply brief(s) in response to Plaintiff's Response to Defendants' Motions to Dismiss. Local Rule 12.1(c) limits the length of reply memoranda to ten (10) pages. Defendants respectfully move this court for leave to file reply brief(s) exceeding the page limitation, not to exceed twenty (20) pages.

In support of their motion, the Parties state as follows:

1. Good cause exists for this request because the legal issues at hand in this case are complex and the Parties' requests will allow them to address those arguments more completely for the Court, and the consolidation of Plaintiff's briefing into a single response will not cause prejudice to either Party or the Court.

WHEREFORE, the Parties respectfully request that the Court enter an order granting the Plaintiff's requested leave to file a single, overlength brief in response to Defendants' Motions to Dismiss and granting the Defendants' requested leave to file an overlength reply.

Respectfully Submitted,

/s/ Greg H. Greubel

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**CERTIFICATE OF SERVICE**

I, Greg H. Greubel, hereby certify that on April 5, 2021, a copy of the foregoing motion was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt, and parties may access this filing through the Court's electronic filing system.

*/s/ Greg H. Greubel*

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Greg H. Greubel